

1 MICHAEL ZORKIN (Bar No. CA 313308)
Email: mz@thezorkinfirm.com
2 THE ZORKIN FIRM
6320 Canoga Ave., 15th Floor
3 Woodland Hills, California 91367
Telephone: 323.493.8075
4

5 Attorneys for Putative Partner of Alleged Debtor
Alexander Sabadash
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7

8 UNITED STATES BANKRUPTCY COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 In re:
12 Itkin & Sabadash,
13 Debtor,
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No. 2:25-bk-11235-NB

Hon. Neil W. Bason

**SECOND SUPPLEMENTAL
DECLARATION OF MICHAEL
ZORKIN IN SUPPORT OF
PUTATIVE PARTNER
ALEXANDER SABADASH'S
MOTION FOR FEES AND
DAMAGES UNDER 11 U.S.C. §
303(I) AND MOTION FOR
SANCTIONS UNDER FRBP 9011**

Hearing Date: September 9, 2025
Hearing Time: 2:00 pm.

DECLARATION OF MICHAEL ZORKIN

I, Michael Zorkin, declare as follows:

I am an attorney and counsel of record for Alexander Sabadash in this Action as well as the *Itkin v. Sabadash* (Case No. BC647351) action pending in the Los Angeles County Superior Court. If called as a witness, I could and would competently testify to all facts within my personal knowledge.

1. I submit this declaration to inform the Court and the parties of the additional fees incurred by Alexander Sabadash since the replies in support of fees and sanctions were filed. The additional fees were incurred for preparation for and attendance of the September hearing and preparation for and attendance of the November mediation, as ordered by this Court.

2. An award of the additional fees is appropriate because 11 U.S.C. § 303(i) is a fee-shifting provision that applies to all facets of the case. *See In re S. California Sunbelt Devs., Inc.*, 608 F.3d 456, 463 (9th Cir. 2010).

3. Since my previous declarations, I spent a total of 26.7 hours on this matter. I anticipate spending additional 10 hours hearing preparation and attendance. The total attorneys' fees sought, not counting fees requested in my previous declarations, is \$20,185.

4. The total fees incurred to date is \$113,630.

5. A detailed billing summary is attached as **Exhibit 30**.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and accurate. Executed: Nov. 13, 2025.

By: /s/ Michael Zorkin
Michael Zorkin

Exhibit 30



6320 Canoga Ave., 15th Floor
Woodland Hills, CA 91367
Phone: (323) 493-8075
Email: mz@thezorkinfirm.com

INVOICE

Invoice # 757
Date: 10/26/2025
Due On: 11/24/2025

Alexander Sabadash

10001-007

Chapter 7 Bankruptcy

Type	Date	Notes	Quantity	Rate	Total
Service	09/05/2025	Review and analyze Itkin's submissions to Jersey Court.	0.20	\$550.00	\$110.00
Service	09/09/2025	Prepare for hearing on motion for fees and sanctions.	2.60	\$550.00	\$1,430.00
Service	09/09/2025	Attend hearing on motion for fees and sanctions.	1.40	\$550.00	\$770.00
Service	09/09/2025	Review and analyze list of potential mediators.	0.20	\$550.00	\$110.00
Service	09/09/2025	Communicate with client re: [REDACTED]	0.50	\$550.00	\$275.00
Service	09/12/2025	Further review mediator lists and contact mediators for availability.	0.70	\$550.00	\$385.00
Service	09/12/2025	Communicate with creditors' counsel re: mediator selection.	0.10	\$550.00	\$55.00
Service	09/16/2025	Communicate with Creditor's counsel re: mediator selection.	0.10	\$550.00	\$55.00
Service	09/17/2025	Further communicate with Creditor's counsel re: mediation scheduling.	0.20	\$550.00	\$110.00
Service	09/19/2025	Communicate with creditor's counsel re: arbitration.	0.10	\$550.00	\$55.00
Service	09/19/2025	Review and analyze order appointing mediator.	0.20	\$550.00	\$110.00
				Total	\$3,465.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
757	11/24/2025	\$3,465.00	\$0.00	\$3,465.00
Outstanding Balance				\$3,465.00
Total Amount Outstanding				\$3,465.00

Please make checks payable to The Zorkin Firm, Law Corporation.

[Redacted Address Block]

THE ZORKIN FIRM

TRIAL LAWYERS



6320 Canoga Ave., 15th Floor
Woodland Hills, CA 91367
Phone: (323) 493-8075
Email: mz@thezorkinfirm.com

INVOICE

Invoice # 760
Date: 11/10/2025
Due On: 12/10/2025

Alexander Sabadash

10001-007

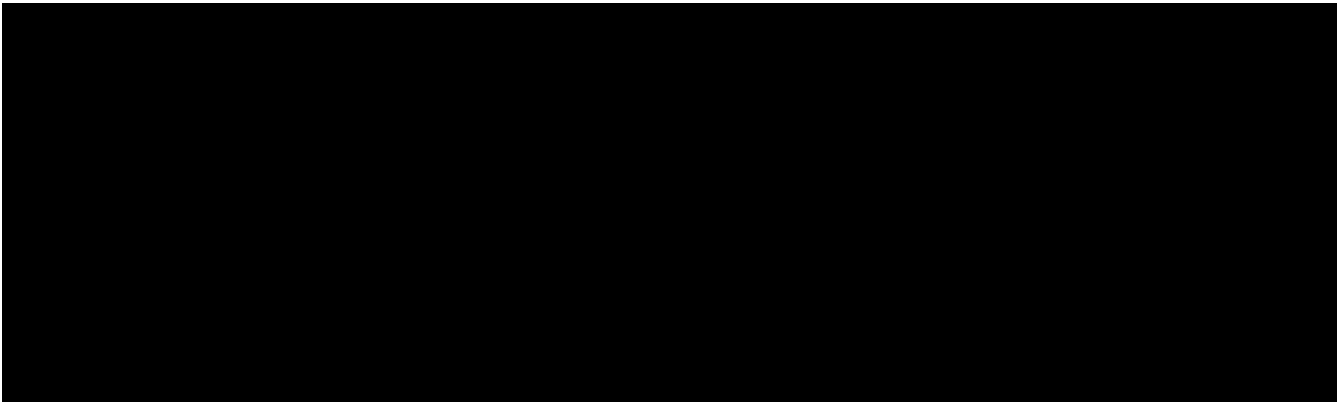
Chapter 7 Bankruptcy

Type	Date	Notes	Quantity	Rate	Total
Service	10/09/2025	Attend status conference re: mediation.	0.40	\$550.00	\$220.00
Service	10/14/2025	Call with client re: [REDACTED]	0.40	\$550.00	\$220.00
Service	10/15/2025	Analyze strategy for mediation.	1.70	\$550.00	\$935.00
Service	10/16/2025	Draft mediation brief.	1.40	\$550.00	\$770.00
Service	10/17/2025	Further draft and revise mediation brief.	1.60	\$550.00	\$880.00
Service	10/21/2025	Further revise mediation brief.	2.60	\$550.00	\$1,430.00
Service	10/22/2025	Further revise mediation brief.	1.70	\$550.00	\$935.00
Service	10/23/2025	Call with client re: [REDACTED]	1.10	\$550.00	\$605.00
Service	10/24/2025	Further revise mediation brief.	1.40	\$550.00	\$770.00
Service	10/27/2025	Further revise mediation brief.	1.90	\$550.00	\$1,045.00
				Total	\$7,810.00

Detailed Statement of Account

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Please make checks payable to The Zorkin Firm, Law Corporation.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



INVOICE

Invoice # 761
Date: 11/13/2025
Due On: 12/13/2025

The Zorkin Firm

6320 Canoga Ave., 15th Floor
Woodland Hills, CA 91367

Alexander Sabadash

10001-007

Chapter 7 Bankruptcy

Type	Date	Notes	Quantity	Rate	Total
Service	11/03/2025	Prepare for mediation session.	0.90	\$550.00	\$495.00
Service	11/03/2025	Attend mediation session.	3.50	\$550.00	\$1,925.00
Service	11/10/2025	Draft supplemental declaration re: fees and sanctions.	0.30	\$550.00	\$165.00
Service	11/13/2025	Revise supplemental declaration re: fees and sanctions.	0.40	\$550.00	\$220.00
Service	11/13/2025	Assemble exhibits for supplemental declaration re: fees and sanctions.	1.10	\$550.00	\$605.00
				Total	\$3,410.00

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

6320 Canoga Ave., 15th Floor, Woodland Hills, CA 91367

A true and correct copy of the foregoing document entitled (*specify*): Second Supplemental declaration of Michael Zorkin

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 11/13/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Joseph E Caceres jec@locs.com, generalbox@locs.com
Daniel J McCarthy dmccarthy@hillfarrer.com, spadilla@hillfarrer.com; dflowers@hfbllp.com
Kurt Ramlo Adam RamloLegal@gmail.com, kr@ecf.courtdrive.com, ramlo@recap.email
Charles Shamash cs@locs.com, generalbox@locs.com
Oleg Stolyar astolyar@loeb.com
United States Trustee (LA) ustpreion16.la.ecf@usdoj.g

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/13/2025
Date

Michael Zorkin
Printed Name

/s/ Michael Zorkin
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.